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Attorneys for Defendant
WILSHIRE LAW FIRM, P.L.C.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PAUL RYAN individually and on behalf
of all other similarly situated,

Plaintiff,

vs.

WILSHIRE LAW FIRM, P.L.C.,

Defendant.

Case No. 2:24-cv-08816-MRA-MAR

**STIPULATION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT**

MORE THAN 30 DAYS (L.R. 8-3)

**Complaint Served: November 6,
2024**

**Current Response Date: 12/27/24
Requested Response Date: 1/26/25**

1 IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff Paul
2 Ryan (“Plaintiff”) and Defendant Wilshire Law Firm, P.L.C. (“Wilshire”)
3 (collectively, the “Parties”), by and through their counsel of record, that subject to the
4 approval of the Court, Wilshire’s time to respond to the initial Complaint shall be
5 extended thirty (30) days to January 26, 2025. In support of the Stipulation, the
6 Parties state as follows:

- 7 1. Plaintiff filed the initial Complaint on October 12, 2024.
- 8 2. Wilshire was served with the Complaint on November 6, 2024.
- 9 3. Pursuant to Local Rule 8-3, the parties stipulated to extend Wilshire’s
10 response deadline by thirty days.
- 11 4. Wilshire’s current deadline to respond to the Complaint is December 27,
12 2024.
- 13 5. The Parties met and conferred on December 17, 2024. Wilshire is
14 working diligently to assess the allegations in the Complaint and
15 consider potential informal resolution of this matter. In light of the recent
16 and upcoming holidays, the Parties agree that Wilshire requires
17 additional time to review the Complaint and discuss informal resolution
18 of this matter and/or meet and confer regarding Wilshire’s responsive
19 pleading.
- 20 6. Accordingly, Wilshire requests a further extension of its responsive
21 pleading deadline.

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1 Pursuant to this Stipulation, Wilshire will have until January 26, 2025 to
2 respond to Plaintiff's Complaint.

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4 Dated: December 23, 2024

OLIVER LAW CENTER, INC.

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6 By: /s/ Dana J. Oliver

7 Dana J. Oliver
8 Attorneys for Plaintiff
9 PAUL RYAN

10 Dated: December 23, 2024

TROUTMAN PEPPER HAMILTON
11 SANDERS LLP

12
13 By: /s/ Chad Fuller

14 Chad Fuller
15 Christine Nowland
16 Attorneys for Defendant
17 WILSHIRE LAW FIRM, P.L.C.

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ATTESTATION

I, Chad Fuller, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Plaintiff's counsel, Dana J. Oliver, has concurred in this filing.

/s/ Chad Fuller

Chad Fuller